

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 20-cv-11548-NMG
)	
TEVA PHARMACEUTICALS USA, INC., and)	
TEVA NEUROSCIENCE, INC.,)	
)	
Defendants.)	
)	

JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, Plaintiff, the United States of America, and Defendants, Teva Pharmaceuticals USA, Inc. and Teva Neuroscience, Inc., by their undersigned counsel, respectfully submit the following Joint Motion for Stipulated Protective Order, and state as follows:

1. The parties have agreed to entry of a protective order in this case, and, as explained in greater detail below, affirmatively state that there is good cause supporting the entry of such an order.
2. On August 18, 2020, the United States filed the Complaint in this case, asserting claims for alleged violations of the False Claims Act.
3. The parties anticipate that discovery in this matter may involve the disclosure of confidential information, including: pricing data governed by the confidentiality provisions of the Social Security Act; confidential health information; trade secret or other confidential research or development information; commercial information that bears upon a party's or third-

party's competitive position; personnel files; sensitive personal information; and financial account numbers.

4. Rule 26(c) of the Federal Rules of Civil Procedure authorizes the Court, upon a showing of good cause and as justice may require, to enter a protective order to limit dissemination of confidential information. *See Fed. R. Civ. P. 26(c); Poliquin v. Garden Way, Inc.*, 989 F.2d 527, 532 (1st Cir. 1993) (stating the Court has "broad discretion to decide when a protective order is appropriate and what degree of protection is required.").

5. The parties agree that entry of the [Proposed] Confidentiality Agreement and Stipulated Protective Order, attached hereto, will protect the confidential information of the parties and third-parties in this case and protect the parties from undue burden and oppression.

WHEREFORE, the parties respectfully request that the Court enter the [Proposed] Confidentiality Agreement and Stipulated Protective Order attached as Exhibit A hereto.

Dated: December 16, 2021

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Respectfully submitted,

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